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8 9	Of Counsel: DANIEL BOGDEN United States Attorney		
10	Attorneys for United States of America		
11	UNITED STATES DISTRICT COURT		
12	DISTRICT OF NEVADA		
13	****		
14			
15	GRANT TRUMAN and INGRID TRUMAN,		
16	Plaintiffs,	Case No. 2:11-cv-01255-GMN-VCF	
17	V.		
18	UNITED STATES OF AMERICA,		
19	Defendant.		
20 21	STIPULATION FOR EXTENSION OF CASE DEADLINES (Fifth Request)		
22	Plaintiffs, Grant Truman and Ingrid Truman, and Defendant, the United States of		
23	America, pursuant to Local Rule 6-1, hereby request that the Court modify the Scheduling Order in the case, and state as follows in support: The Court issued a Scheduling Order in this case on November 22, 2013. In accordance		
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26			
27	Dispositive Motions	March 21, 2014	
28			

Pre-trial Order 1 April 21, 2014 In the event dispositive motions are filed, the date for filing the 2 proposed joint pre-trial Order shall be suspended until thirty (30) 3 days after decision of the dispositive motion or further Order of the Court. 4 The parties have recently completed discovery in this matter including the exchange of 5 expert reports and expert depositions. The parties are currently exploring a possible settlement of 6 this matter. Additional time is necessary to allow the parties the opportunity to continue to 7 negotiate a settlement without incurring any additional costs and expenses. Accordingly, the 8 parties hereby request an approximately 60 day extension of the existing deadlines in order to 9 allow the parties to continue to seek a negotiated resolution to this matter. 10 Specifically, the parties hereby respectfully request that the Court amend the Scheduling 11 Order as follows: 12 **Dispositive Motions** May 23, 2014 13 Pre-trial Order June 23, 2014 14 In the event dispositive motions are filed, the date for filing the proposed joint pre-trial Order shall be suspended until thirty (30) 15 days after decision of the dispositive motion or further Order of the 16 Court. 17 /// 18 /// 19 /// 20 /// 21 /// 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28

1	WHEREFORE, the parties request that the Court modify the Scheduling Order in this		
2	case as set forth above.		
3	Respectfully submitted this 13 th day of March, 2014.		
4		KATHRYN KENEALLY	
5	BAILUS COOK & KELESIS, LTD.	Assistant Attorney General	
6			
7	/s/ George P. Kelesis GEORGE P. KELESIS, ESQ.	<u>/s/ Virginia Cronan Lowe</u> VIRGINIA CRONAN LOWE	
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13 14		Of Counsel: DANIEL BOGDEN United States Attorney	
15		Attorneys for Defendant, United States of	
16		America	
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	Page 3 of 3		

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8 9	Of Counsel: DANIEL BOGDEN United States Attorney			
10	Attorneys for United States of America			
11	UNITED STATES DISTRICT COURT			
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13	****			
14				
15	GRANT TRUMAN and INGRID TRUMAN,	G N 2.11 01255 GND WGE		
16	Plaintiffs,	Case No. 2:11-cv-01255-GMN-VCF		
17	V.			
18	UNITED STATES OF AMERICA,			
19	Defendant.			
20	[PROPOSED] ORDER EXTENDING CASE DEADLINES			
21	The Court having read and considered the Stipulation for Extension of Case Deadlines,			
22	and for good cause shown, the Motion is hereby GRANTED.			
23	IT IS HEREBY ORDERED that the following matters are scheduled and may not be			
24	changed without a showing of good cause and Court approval. June 30			
25	Dispositive Motions	-May 23, 2014		
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1	Pre-trial Order July 30 June 23, 2014
2	In the event dispositive motions are filed, the date for filing the proposed joint
3	In the event dispositive motions are filed, the date for filing the proposed joint pre-trial Order shall be suspended until thirty (30) days after decision of the dispositive motion or further Order of the Court.
4	9th May
5	DATED this 9th day of May, 2014.
6	Contractor
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8	UNITED STATES MAGISTRATE JUDGE
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10	No further extensions will be allowed.
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